

UNITED STATE BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re:  
LINDA JEAN DOTSON,  
Debtor.

) Case # 19-46484-659  
)  
) Chapter 7  
)

**DECLARATION IN SUPPORT OF EMPLOYMENT OF  
SPECIAL LITIGATION COUNSEL**

Amanda Sher, declares:

1. I, Amanda Sher, am an attorney at law, duly qualified and licensed to practice in the State of Missouri. I am currently employed at Brown & Crouppen, P.C.

2. I have personal knowledge of the facts stated herein and can testify that said facts are true and correct.

3. Trustee Tracy A. Brown ("Trustee") is seeking to retain my services and the services of Brown & Crouppen, P.C. by the foregoing Application to Employ Special Litigation Counsel ("Application"). I am authorized to make this declaration on behalf of Brown & Crouppen, P.C. I am the attorney primarily responsible for the representation of Linda Jean Dotson ("Debtor") and I have read the Application and to the best of my knowledge all facts stated therein are true and correct.

4. Trustee seeks to employ the law firm of Brown & Crouppen, P.C. to represent the Debtor in matters relating to a personal injury claim arising out of an automobile accident.

5. I am intimately familiar with the facts, circumstances, and issues involved in Debtor's personal injury claim. I am experienced in matters of this type for which the Trustee seeks to employ Brown & Crouppen, P.C. in the Debtor's Chapter 7 case.

6. Brown & Crouppen, P.C. does not, to my knowledge, represent or have any connection with any creditor or other party in the interest in this case, their respective attorneys or

accountants, the Chapter 7 Trustee, or any person employed by the Office of the Chapter 7 Trustee, except as stated above. Brown & Crouppen, P.C. has no interest adverse to the Debtor or the estate with respect to the matters on which it is about to be employed.

7. Neither I nor Brown & Crouppen, P.C. have a pre-petition claim against the Debtor or the Bankruptcy Estate. No agreement or understanding exists between Brown & Crouppen, P.C. and any other persons for the sharing of compensation requested herein. Brown & Crouppen, P.C. has not received an advance against fees or costs in connection with the Debtor's Chapter 7 case.

8. The agreement for compensation for representation of the Debtor with respect to the personal injury claim set forth in the Application is the standard retainer agreement used by Brown & Crouppen, P.C. and is based on the customary practice of other attorneys and other law firms in the local legal community.

9. I understand that if there is no recovery for the Bankruptcy Estate arising out of the personal injury claim of the Debtor, no costs or expenses incurred as Special Litigation Counsel can be recovered from the Trustee, the Debtor, or the Bankruptcy Estate. I also understand that there are specific requirements regarding employment and compensation for professionals in the bankruptcy system and I shall comply with them.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11<sup>th</sup> day of February, 2020

*Amanda SB*  
SPECIAL LITIGATION COUNSEL

STATE OF Missouri )  
 )ss  
COUNTY OF st. Louis )

Sworn to and submitted before me on this the 11 day of February, 2020.

*Elisha K. Viccone*  
Notary Public

My Commission Expires:

